

FILED 21 JUL 22 15:27 USDC-ORE

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

UNITED STATES OF AMERICA

21 JW  
6:22-cr-00408-MC

v.

MEERAALI SHAIK,

SUPERSEDING  
INDICTMENT

Defendant.

26 U.S.C. § 7201  
26 U.S.C. § 7206(1)

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this Indictment,

1. MEERAALI SHAIK was a resident of Oregon.
2. SHAIK owned and operated Evergreen Indian Cuisine, LLC/Evergreen South & North Cuisine located in Eugene, Oregon (EIC-Eugene), and co-owned and operated Evergreen Indian Cuisine, LLC/Evergreen North & South Cuisine located in Corvallis, Oregon (EIC-Corvallis).
3. SHAIK used a tax preparation company to prepare his tax returns. Every year, SHAIK was provided and signed an organizer and engagement letter sent to him by his tax preparer. The engagement letter informed him that he was responsible for reporting information correctly.

**COUNT 1**  
**(Tax Evasion)**  
**(26 U.S.C. § 7201)**

4. Paragraphs 1 through 3 of the General Allegations are incorporated herein.

5. From on or about January 1, 2015, through on or about July 26, 2016, in the District of Oregon, defendant **MEERAALI SHAIK** willfully attempted to evade and defeat the assessment of income tax due and owing by him to the United States of America, for calendar year 2015, by committing the following affirmative acts, among others:

- a. Signing and causing to be signed, for calendar years 2015, a false and fraudulent U.S. Individual Income Tax Return, Form 1040 which underreported his income, both of which were submitted to the Internal Revenue Service;
- b. Depositing and causing to be deposited cash receipts from EIC-Eugene and EIC-Corvallis into personal bank accounts;
- c. Providing his tax preparer with incomplete bank and income records, or causing others to provide the same, including but not limited to failing to provide his tax preparer with accurate information regarding cash receipts received by EIC-Eugene and EIC-Corvallis;
- d. Using or causing to be used EIC-Eugene and EIC-Corvallis cash receipts to pay mortgage and equity lines of credit on properties in Eugene, Corvallis, and Chandler, Arizona; and
- e. Using or causing to be used unreported cash receipts to pay employee tips, tips that were reported to **SHAIK'S** tax preparer to reduce his tax liability.

In violation of Title 26, United States Code, Section 7201.

**COUNT 2**  
**(Tax Evasion)**  
**(26 U.S.C. § 7201)**

6. Paragraphs 1 through 3 of the General Allegations are incorporated herein.
7. From on or about January 1, 2016, through on or about March 23, 2017, in the District of Oregon, defendant **MEERAALI SHAIK** willfully attempted to evade and defeat the assessment of income tax due and owing by him to the United States of America, for calendar year 2016, by committing the following affirmative acts, among others:
  - a. Signing and causing to be signed, for calendar years 2016, a false and fraudulent U.S. Individual Income Tax Return, Form 1040 which underreported his income, both of which were submitted to the Internal Revenue Service;
  - b. Depositing and causing to be deposited cash receipts from EIC-Eugene and EIC-Corvallis into personal bank accounts;
  - c. Providing his tax preparer with incomplete bank and income records, or causing others to provide the same, including but not limited to failing to provide his tax preparer with accurate information regarding cash receipts received by EIC-Eugene and EIC-Corvallis;
  - d. Using or causing to be used EIC-Eugene and EIC-Corvallis cash receipts to pay mortgage and equity lines of credit on properties in Eugene, Corvallis, and Chandler, Arizona; and
  - e. Using or causing to be used unreported cash receipts to pay employee tips, tips that were reported to **SHAIK'S** tax preparer to reduce his tax liability.

In violation of Title 26, United States Code, Section 7201.

**COUNT 3**

**(Making and Subscribing a False Federal Income Tax Return)**  
**(26 U.S.C. § 7206(1))**

8. Paragraphs 1 through 3 of the General Allegations are incorporated herein.

9. On or about July 26, 2016, in the District of Oregon, defendant **MEERAALI SHAIK** did willfully make and subscribe a false IRS Form 1040, Individual Tax Return, for the tax year 2015, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That Form 1040 was prepared and signed in the District of Oregon and filed with the Internal Revenue Service. In that tax return, defendant **SHAIK** stated his Schedule E income was \$239,880, whereas, as he then and there knew and believed, he received substantial Schedule E income in addition to the amount stated on the return.

In violation of Title 26, United States Code, Section 7206(1).

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**COUNT 4**  
**(Making and Subscribing a False Federal Income Tax Return)**  
**(26 U.S.C. § 7206(1))**

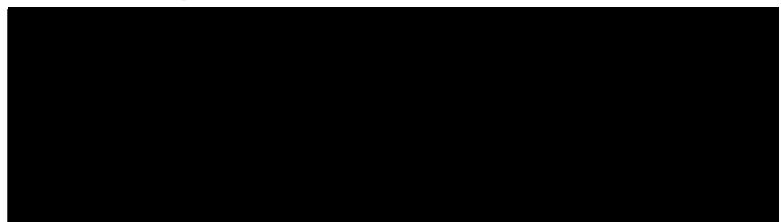
10. Paragraphs 1 through 3 of the General Allegations are incorporated herein.

11. On or about March 23, 2017, in the District of Oregon, defendant **MEERAALI SHAIK** did willfully make and subscribe a false IRS Form 1040, Individual Tax Return, for the tax year 2016, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That Form 1040 was prepared and signed in the District of Oregon and filed with the Internal Revenue Service. In that tax return, defendant **SHAIK** stated his Schedule E income was \$236,332, whereas, as he then and there knew and believed, he received substantial Schedule E income in addition to the amount stated on the return.

In violation of Title 26, United States Code, Section 7206(1).

Dated: July 21, 2022

A TRUE BILL.



Presented by:

NATALIE WIGHT  
United States Attorney



GAVIN W. BRUCE, OSB# 113384  
Assistant United States Attorney